

1. Since at least in or about 2018, up to and including the present, in the Southern District of New York and elsewhere, WILLIE DENNIS, the defendant, with the intent to injure, harass, and intimidate another person, used the mail, interactive computer services and electronic communication services and electronic systems of interstate commerce, and other facilities of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, to wit, DENNIS has engaged in a campaign of harassment, intimidation, and threats against an individual ("Victim-1") who works in New York, New York, including by sending harassing, threatening, and intimidating emails and text messages to

Victim-1.

(Title 18, United States Code, Sections 2261A(2)(B) and 2.)

COUNT TWO
(Cyberstalking)

The Grand Jury further charges:

2. In or about 2019, in the Southern District of New York and elsewhere, WILLIE DENNIS, the defendant, with the intent to injure, harass, and intimidate another person, used the mail, interactive computer services and electronic communication services and electronic systems of interstate commerce, and other facilities of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, to wit, DENNIS has engaged in a campaign of harassment, intimidation, and threats against an individual ("Victim-2") who works in New York, New York, including by sending harassing, threatening, and intimidating text messages to Victim-2.

(Title 18, United States Code, Sections 2261A(2)(B) and 2.)

COUNT THREE
(Cyberstalking)

The Grand Jury further charges:

3. From at least in or about 2018, up to and including at least in or about October 2020, in the Southern District of New York and elsewhere, WILLIE DENNIS, the defendant, with the

intent to injure, harass, and intimidate another person, used the mail, interactive computer services and electronic communication services and electronic systems of interstate commerce, and other facilities of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, to wit, DENNIS has engaged in a campaign of harassment, intimidation, and threats directed at an individual ("Victim-3") who works in New York, New York, including by sending harassing, threatening, and intimidating text messages to Victim-3.

(Title 18, United States Code, Sections 2261A(2)(B) and 2.)

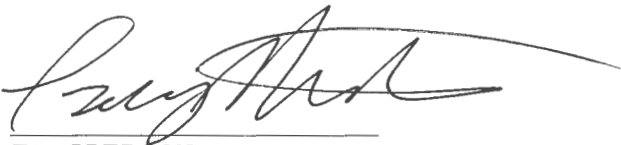
COUNT FOUR
(Cyberstalking)

The Grand Jury further charges:

4. From at least in or about 2019, up to and including the present, in the Southern District of New York and elsewhere, WILLIE DENNIS, the defendant, with the intent to injure, harass, and intimidate another person, used the mail, interactive computer services and electronic communication services and electronic systems of interstate commerce, and other facilities of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, to wit, DENNIS has engaged in a campaign of harassment,

intimidation, and threats directed at an individual ("Victim-4") who works in New York, New York, including by sending harassing, threatening, and intimidating emails and text messages to Victim-4.

(Title 18, United States Code, Sections 2261A(2)(B) and 2.)


FOREPERSON
AUDREY STRAUSS
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

WILLIE DENNIS,

Defendant.

SEALED INDICTMENT

20 Cr.

(18 U.S.C. §§ 2261A(2)(B) and 2.)

AUDREY STRAUSS

Acting United States Attorney

Foreperson
